

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:

ROMAN CATHOLIC ARCHBISHOP OF
BALTIMORE,

Debtor.¹

Chapter 11

Case No. 23-16969-MMH

Related to Docket Nos. 8, 46, 85, & 147

CERTIFICATE OF NO OBJECTION

On September 29, 2023, the Roman Catholic Archbishop of Baltimore (the “*Debtor*”), by and through its undersigned counsel, caused to be filed its *Debtor’s Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor’s Proposed Form of Adequate Assurance of Payment to Utility Companies Under Section 366 of the Bankruptcy Code, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief* (Dkt. No. 8) (the “*Motion*”).

The undersigned counsel hereby certifies that:

1. The Motion was timely served on all interested parties in the manner of service referenced in the Motion.

2. Pursuant to the Court’s *Notice of Final Hearing on Debtor’s First-Day Motions and Objection Deadline* (Dkt. No. 53), the deadline to respond or object to the Motion was October 25, 2023.

3. On October 13, 2023, Baltimore Gas & Electric Company (“*BG&E*”) caused to be filed the *Objection of Baltimore Gas and Electric Company to the Debtor’s Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor’s Proposed Form of Adequate Assurance*

¹ The last four digits of the Debtor’s federal tax identification number are 1535. The Debtor’s principal place of business is located at 320 Cathedral Street, Baltimore, Maryland 21201.

of Payment to Utility Companies under Section 366 of the Bankruptcy Code, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief(Dkt. No. 85).

4. In accordance with this Court's *Interim Order (I) Authorizing Debtor's Proposed Form of Adequate Assurance of Payment to Utility Companies Under Section 366 of the Bankruptcy Code, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief*(Dkt. No. 46), BG&E and the Debtor resolved the foregoing objection.

5. As a result, on November 1, 2023, BG&E caused to be filed the *Notice of Withdrawal of Objection of Baltimore Gas and Electric Company To The Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor's Proposed Form of Adequate Assurance of Payment to Utility Companies under Section 366 of the Bankruptcy Code, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief*(Dkt. No. 147).

6. No other objections to the Motion have been received, and as of the date of this filing, a check of the electronic entries docketed in this case confirms that none have been filed.

Dated: November 1, 2023

Respectfully submitted,

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*Proposed Attorneys for the Debtor and Debtor
in Possession*

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of November 2023, notice of filing the Certificate of No Objection (the “Certificate”) was served by CM/ECF to those parties listed on the docket as being entitled to such electronic notices, which parties are identified on the attached service list. In addition, Epiq Corporate Restructuring, LLC will cause a true and correct copy of the Certificate to be served on all parties required to be served, with a certificate or affidavit of service to be filed subsequently, all in accordance with Local Rule 9013-4.

/s/ Catherine Keller Hopkin
Catherine Keller Hopkin

**The following parties received
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